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October 13, 1998

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Hand Delivered


Re: RealWorld Advanced Technology Inc.
Request for Waiver
CC Docket No. 96-45

Dear Ms. Salas:

Transmitted herewith, on behalf of STAR Telecommunications, Inc. ("STAR") and pursuant to the FCC's September 17, 1998 Public Notice, DA 98-1872, are an original and six copies of STAR's comments on the above-referenced waiver request. Copies of these comments are also being delivered today to Sheryl Todd of the Common Carrier Bureau and to International Transcription Services, Inc. A copy of the comments on diskette is also being provided to Sheryl Todd.

In the event there are questions concerning this matter, please contact me.

Very truly yours,



R. Edward Price

Enclosure

cc (w/enc.): Sheryl Todd
International Transcription Services, Inc.

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INC.

pursuant to the

their domestic end-user revenues only.

Although STAR supports RealWorld's waiver request, it believes that rather than rule on waiver requests such as RealWorld's on an ad hoc basis, the Commission should initiate a proceeding to establish the grounds for a waiver of the USF contribution requirements for international carriers that is consistent with the FCC's international resale and switched hubbing policies (i.e., does not penalize carriers for hubbing traffic via the United States).

Respectfully submitted,

STAR TELECOMMUNICATIONS, INC.

By: 

Gregory C. Staple

R Edward Price

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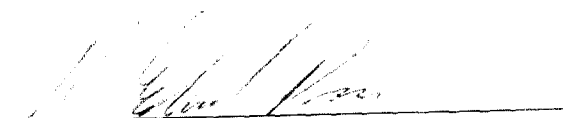
Its Attorneys

October 13, 1998

CERTIFICATE OF SERVICE

I, R. Edward Price, do hereby certify that on October 13, 1998, copies of the foregoing "COMMENTS OF STAR TELECOMMUNICATIONS, INC." were served via first class U.S. Mail, postage prepaid to the following:

Robert Tucker
RealWorld Advanced Technology Inc.
501 Boyden Avenue
Maple Wood, New Jersey 07840


R Edward Price